ANDREA BEATTY RINIKER
Director

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
4350 - 150th Ave. N.E. • Redmond, Washington 98052-5301 • (206) 885-1900

March 2, 1987

John Lavillette, PE
Plant Industrial Engineer
Earle M. Jorgensen Co.
8531 East Marginal Way South
Seattle, WA 98108

Dear Mr. Lavillette:

On Friday, January 5, 1986, Mary Kautz and I met with you, J. Allen Moren, and Bob Bluher at your plant. The purpose of the meeting was to review Jorgensen's NPDES permit before I did the first NPDES Compliance Inspection as your new inspector, replacing Barb Smith.

The reasons for scheduling an inspection were three discharges in excess of the monthly monitoring requirement minimum standards, received in this office on November 11, 1986. The problem areas were follows:

Quench Tanks	10-6-86	10-7-86	Limitations
Q4	9.4		6-9
Q9		9.2	6-9
Vacuum Degasser	8-6-86	Daily Maximum	
	0.75 mg/l	0.062	

Mary Kautz and I met with you in a conference room in your office to review the November 10, 1986 report. Mary Kautz and I then got proper safety gear to begin an inspection of your plant. We requested a tour of the entire process with special emphasis on Quench Tanks Q4 and Q9, The Degasser, and the discharge points.

At the bank of the river we noted the steepness of the bank and the difficulty in obtaining samples. The area is locked from general access and is dark even in daylight hours.

The degasser area had large areas of open water around it. This water is used for non-contract cooling water. Bob Bluher felt strongly that there was no possibility of zinc contamination to the water because zinc would be damaging to the process itself. Jorgensen takes care not to have zinc in this area for production reasons.

Q4 is the smaller, permanent quench tank. It is in the main building east of the degasser. It is exposed to the main building fugitive dust as is the degasser.

Q9 is the larger portable tank. This tank can be assembled in lengths up to 65 feet. It is kept outside in the main yard and used once every two or three months.

After the inspection, we returned to the conference room to discuss ways to eliminate future problems involving discharges in excess of permit limits. Jorgensen personnel expressed some questions about the accuracy of the analysis of the sample from the degasser. I suggested duplicate samples be taken and one held in reserve. We did not come to any resolution of this issue. The reports received at Ecology on February 9, 1987 showed no problems.

The portable quench tank, Q9, has not been used since our meeting. The permanent quench tank, Q4, was monitored for pH from 12-17-86 to 1-30-87 per my request. I received the report on February 9, 1987, showing no problems with pH during this time. It is my understanding from a December 17, 1986 telephone conversation with you that Jorgensen has purchased portable pH meters and will do onsite monitoring of the quench tanks in the future.

Thank you for your cooperation in this inspection. If you have any questions please contact me.

Sincerely,

Lee Dorigan
Field Inspector

LD:cd

cc: Dan Cargill
Mary Kautz